

REQUEST for STAKEHOLDER COMMENT

Design and Development of an Insurance Exchange in Connecticut

The following information is organized by general topic area, with a list of questions we would like you/your organization to answer as you feel appropriate. These questions are followed by background briefings to provide a general understanding of the topics. To encourage productive discussion during each meeting, we are providing you this information in advance of your meeting. While these topic areas are the specific issues for which public comment is requested, please feel free to offer any other comments on policies related to the Exchange and the insurance market as well.

This information is submitted from:

Name: Margherita R. Giuliano_____ Phone: 860-563-4619

Organization: _CT Pharmacists Association_____ Email: _mgiuliano@ctpharmacists.org _____

Address: 35 Cold Spring Rd., Ste 121 Rocky Hill, CT 06067 _____

QUESTIONS

Please provide us with your thoughts and insights on the questions listed below as you feel appropriate.

A. Establish a Responsive and Efficient Structure

1. Should Connecticut consider joining a multi-state Exchange? Under a regional Exchange, would Connecticut benefit most from a separate or merged risk pool?
Due to different state laws I don't know how effective a multi-state Exchange would be.
Not sure
2. Should Connecticut administer the Exchanges for the individual and small group markets separately or jointly? If jointly, should Connecticut maintain separate risk pools for the two Exchanges, or merge the risk pools.
Not sure
Merge the risk pools
3. Should Connecticut open the Exchange to businesses with 2-100 employees in 2014, or should it allow businesses with 2-50 employees in 2014 and increase participation to businesses with 51-100 employees in 2016?
2-100 in 2014
4. Should Connecticut seek to expand access to businesses with more than 100 employees in 2017, with HHS approval?
yes

B. Address Adverse Selection and the External Market

1. Should Connecticut allow a dual market, a hybrid market, or should it require that all individual insurance be sold through the Exchange? Under a dual market scenario, what additional rules should Connecticut establish to prevent insurers from discouraging participation in the Exchange? What hybrid models might Connecticut consider, and what characteristics do they offer that would benefit Connecticut?

Dual market

All plans should have the same basic components.

2. Are there any additional mechanisms to mitigate adverse selection that Connecticut should consider implementing as part of the Exchange?

All plans should have the same core minimum benefits

3. How should the temporary reinsurance program be approached in Connecticut? What issues should Connecticut be aware of in establishing these mechanisms?

Not sure

C. Simplify Health Insurance Purchase

1. What issues should Connecticut consider in establishing a Navigator program?

There should be a site that people can go to compare the options like CMS developed for Medicare D. Should use every effort to keep bias out of the program selection.

2. What should Connecticut consider regarding the role of insurance brokers and agents?

Not sure. Concern is over “selling” to people vs proper coverage

D. Increase Access to and Portability of High Quality Health Insurance

1. Should Connecticut allow any plan that meets Qualified Health Plan standards to be available in the Exchange, or should Connecticut establish additional requirements? If additional requirements, what would you recommend? What would be impact of those requirements?

There should be a minimum core set of standards that are required for a plan to be in the exchange. These standards should be determined by the State of CT. Therefore, there may be additional requirements. A basic prescription drug benefit should be part of every plan. Our focus is on pharmacist services which go beyond drug distribution. With the increase in medication use and the complexity of drug therapies it is critical to provide a comprehensive medication review and medication therapy management services for a subset of the population. These services should be part of the Medical coverage, not part of the prescription drug benefit.

2. Should Connecticut consider establishing the Basic Health Program? What would the Basic Health Program offer as a tool to facilitate continuity of coverage and care?

Yes.

Not sure. With the Health Information Exchanges being developed there will be unique identifiers that could be utilized for patients. That would help track where patients are as their coverage changes. It needs to be a real time system or as close to that as possible to minimize gaps in coverage.

3. How would the Basic Health Program impact other related programs in Connecticut?

I think the basic health program would set the minimum standards that CT accepts and other plans would need to either add to their program to be in the exchange or not be part of the exchange. By setting these standards for the public plans I think we can positively impact the quality of care provided.

4. How can Connecticut structure its Exchanges to maximize continuity of coverage and seamless transition between public and private coverage? (E.g. as a person moves from Medicaid, subsidized and non-subsidized markets)

Again by assigning unique identifiers for each person in the exchange you can track where the individual is.

E. Ensure Greater Accountability and Transparency

1. What information should Connecticut include for outreach to most effectively engage consumers? How should the information be presented?

The information provided needs to be culturally and linguistically appropriate for the groups we are trying to reach. There are many community groups and consumer advocates that can help engage consumers. We should maximize the use of the state websites. The State could engage “Choices” as they did for Medicare Part D.

2. How should Connecticut ensure ongoing feedback and input about accountability, operational issues, and suggested improvements?
Surveys. Adopt national quality measures that must be met. Insist on transparency – follow the dollar – where it is being spent. Transparency in plans is critical.
3. What information, beyond that required under the ACA and implementing regulations, should Connecticut require of plans? How much of this information should be shared with consumers accessing the Exchange?
A report card for the plans would be informative. Depends on how comprehensive the report card is.

F. Self-Sustaining Financing

1. How should the Exchange's operations be financed beginning in 2015
Insurers should be charged to be part of the exchange. We might want to look at how data will be collected and utilized. I also think that the Insurance Exchange could interface somehow with the Health Information Exchange. Not sure – but there could be opportunities.
2. How might the state's financing strategies encourage or discourage participation in the Exchange; affect the reputation of the Exchange; and affect accountability, transparency, and cost-effectiveness?
I am sure that groups may not want to participate if they have to pay to play. Need to have that value proposition. In any case, the exchange must insist on accountability, transparency and cost-effectiveness. Maybe there is a "reward" system built in. Pay for performance?
3. What issues should be considered regarding state requirements for additional benefits above the minimum essential benefits? What funding sources should be considered for the cost of additional benefits?
As a state pharmacist organization, we believe that Medication Therapy Management is critical for a subset of the population. These services should be part of core medical benefits. Not sure where funding sources will come from. I believe payers and employers will understand the value in the return on investment that will be obtained from the benefit.

G. Under the ACA, an Exchange is responsible for performing a specified list of functions. However, many decisions are left to the states.

1. Beyond the Exchange's minimum requirements, are there additional functions that should be considered for Connecticut's Exchange? Why?
As a state pharmacist organization, we believe that Medication Therapy Management is critical for a subset of the population. These services should be part of core medical benefits. The Institute of Medicine reports: *Preventing Medication Errors* and *To Err is Human* strongly recommended that health care priorities should be on improving patient care and reducing medication errors. Pharmacists provided care in CT under a Medicaid Transformation Grant that identified 917 drug therapy problems in 88 Medicaid patients and were able to resolve 80 percent of them after 4 encounters. There was an estimated annual savings of \$1123/person on medication claims and \$472/patient on medical hospital and emergency department expenses. These savings have been replicated in other studies and demonstration programs throughout the country that have used pharmacists to provide services.
2. Are there advantages to limiting the number of plans offered in the Exchange, or is the Exchange a stronger marketplace if it permits "any willing provider" to sell coverage?
Any willing provider should be allowed to sell coverage.
3. Should Connecticut consider setting any conditions for employer participation in the small group exchange (e.g. minimum percent of employees participating, minimum employer contribution, limits in the range of product benefit values that may be selected by employees, etc)?
Not sure. Small employers are already under a lot of financial pressures.
4. What are some of the initiatives that could maximize flexibility and offer a value for small business employers to utilize the Exchange?

Give a menu driven benefit.

5. What should be the role of the Exchange in premium collection and billing?

Not sure. If the Exchange is operating programs for state employees and Medicaid I would assume they would either do the administrative services themselves or contract with a third party administrator.

6. What are all the different data collection and reporting mechanisms that are necessary to operate a transparent and accountable Exchange?

I couldn't begin to answer this question. Our organization has been promoting transparency for years, especially from HMOs and PBMs. There are so many pieces I would only recommend that someone be vigilant in determining the data needed to have a truly transparent system. There definitely should be reports for accountability and for quality. There are probably some national resources to help in this process.

BACKGROUND by TOPIC AREA

The general information on each topic area below is intended for brief reference only.

A. Establish a Responsive and Efficient Structure

The ACA requires that all states establish an American Health Benefits Exchange for the individual market and a Small Business Health Options Program (SHOP Exchange) for the small group market. States may operate these independently or may combine them into a single Exchange. States may also form regional or multi-state Exchanges.

For the purpose of inclusion in the SHOP Exchange, the ACA defines small employers as an employer with 2-100 employees. However, until 2016, states may limit this definition to 2-50 employees; and after 2017 states may further expand participation in the SHOP Exchange.

B. Address Adverse Selection and the External Market

The ACA allows states to establish a “dual market” in which individual insurance may be purchased in and out of the Exchange, or to require that all health insurance plans sold on the individual market must be sold through the Exchange. States may also design “hybrid” solutions such as permitting supplemental coverage to be sold in external markets but requiring that all individual major medical coverage be sold in the Exchange.

The ACA establishes certain rules to protect against selection issues in a dual market, but does not deny states the ability to include additional requirements for insurance sold in the Exchange and an external market. State options include but are not limited to requiring that all insurers in the Exchange offer all four tiers of coverage, standardizing benefits packages, and restricting the sale of “catastrophic” insurance plans. However at a minimum, the following rules apply:

- Plans inside and outside of an Exchange must be in the same risk pool, have the same premium rate (for those sold by the same company), and meet the same minimum benefits standards.
- Insurers inside and outside the Exchange may not deny coverage on the basis of pre-existing conditions, medical status, or claims history.
- Premium variation based on age, geographic location, and smoking status must apply to plans sold both inside and outside the Exchange.
- Plans sold in the Exchange must have an open enrollment period and special enrollment periods to encourage participants to purchase coverage before they become sick.

The ACA requires that states establish a reinsurance program for the individual market inside and outside of the Exchange, for the first three years of Exchange operation. The NAIC will develop model legislation to carry out this provision. States must consider issues such as how to coordinate their high risk pools with this program.

C. Simplify Health Insurance Purchase

The ACA requires an Exchange to establish a “Navigator” program to conduct public education, advise individuals and small groups that enroll in the Exchange, help them enroll in health plan and access benefits, and provide

referrals as needed to the health care ombudsman. The Navigator program must be established by awarding grants to a variety of groups, and must be financed through operational funds of the Exchange (not Federal funds received by the state to establish the Exchange).

With establishment of an Exchange, the existing relationship between brokers, carriers, and consumers is likely to change. The ACA leaves states flexibility to make decisions regarding these relationships, such as designating an official role for brokers within the Exchange apparatus, requiring certification, or regulating commissions.

D. Increase Access to and Portability of High Quality Health Insurance

The ACA requires that health plans that wish to participate in an Exchange (Qualified Health Plans) comply with certain requirements related to marketing, choice of providers, plan networks, and essential health benefits. Beyond this, states may establish additional requirements for plans that are offered on an Exchange.

The ACA provides states with the option of operating a Basic Health Program for individuals between 133% and 200% of the federal poverty level, in lieu of those individuals receiving premium subsidies for purchase of coverage. The benefits under the Basic Health Program must be at least equivalent to the essential health benefits and premiums may not be higher than those in the Exchanges.

With health care reform, individuals may be eligible for one of a variety of insurance options: Medicaid, CHIP, subsidized coverage through an insurance Exchange, and unsubsidized coverage through an Exchange. The ACA requires that there should be a single seamless process of applying for coverage for all of these programs – regardless of where a consumer enters the system.

E. Ensure Greater Accountability and Transparency

The ACA requires that Exchanges post information on the cost and quality of health plans. Specifically, states must develop an Internet website for standardized comparative information on plans, provide public ratings of participating Exchange plans, and use a standard format for presenting health plan options in the Exchange.

F. Self-Sustaining Financing

The ACA includes grant funding for planning and establishment of Exchanges, but beginning January 1, 2015, state Exchanges must be financially self-sustaining.

The ACA establishes a minimum essential benefit set to be sold inside and outside an Exchange. A state may choose to require additional benefits but must cover the cost of those benefits for individuals eligible for tax credits through an Exchange.

G. Under the ACA, an Exchange is responsible for performing a specified list of functions. However, many decisions are left to the states.

Under federal law, the Exchange is required to perform these functions:

- Certify, recertify, and decertify qualified health benefits plans under the guidelines established by the federal Department of Health and Human Services (HHS)
- Operate a toll-free customer assistance hotline
- Maintain a website that allows customers to compare qualified health benefits plans offered by different insurance carriers
- Assign a rating to each qualified health plan under the rating system that will be established by HHS
- Use a standardized format to present four coverage options (bronze, silver, gold, and platinum), plus the catastrophic plan design for young adults/exemptions
- Inform individuals about the existence of—and their eligibility for—public programs, including but not limited to Medicaid and Children’s Health Insurance Program (CHIP)
- Certify individuals who are exempt from the individual mandate on the basis of hardship or other criteria to be established by HHS

- Transfer information to the federal Secretary of Treasury regarding individual mandate exemptions and subsidies awarded due to a failure on the part of a small employer to provide sufficient affordable coverage
- Provide information to employers on their employees who are not covered
- Establish a network of navigators to raise awareness among customers of their coverage options and to help people select and enroll in health plans and subsequently access benefits